

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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|--------------------------------------|---|----------------------|
| FRANK D. SEINFELD, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C. A. No. 05-298-JJF |
| |) | |
| CRAIG R. BARRETT, CHARLENE |) | |
| BARSHIEFSKY, E. JOHN P. BROWNE, |) | |
| D. JAMES GUZY, REED E. HUNDT, |) | |
| PAUL S. OTELLINI, DAVID S. POTTRUCK, |) | |
| JANE E. SHAW, JOHN L. THORNTON, |) | |
| DAVID B. YOFFIE, ANDREW S. GROVE, |) | |
| and INTEL CORPORATION, |) | |
| |) | |
| Defendants. |) | |

DEFENDANTS' MOTION FOR EXTENSION OF TIME

Defendants respectfully move for an extension of time within which to answer, move or otherwise respond to plaintiff's Verified Complaint for the following reasons:

1. Plaintiff filed its Verified Complaint in this action on May 16, 2005, alleging disclosure violation and breaches of fiduciary duty.
2. After receipt of service of the Verified Complaint, defendants made a diligent search for counsel and only recently retained counsel in both California and Delaware.
3. In order to file an appropriate response to the complaint, counsel for defendants believe that additional time is needed to investigate the facts and research the applicable law. Defendants believe that a motion to dismiss is appropriate, but need an extension of two weeks to complete the required investigation and analysis.

4. Recognizing this, defendants requested an extension of time to move, answer or otherwise respond to the Verified Complaint. Plaintiff, however, refused to grant the requested extension.

5. Plaintiff will not suffer any prejudice as a result of the extension of time that defendants request.

6. No scheduling order has been entered in this case, and therefore no other dates will be affected by the extension that defendants request.

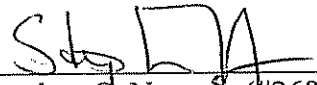
7. Defendants therefore respectfully request that the Court grant an extension of time until June 20, 2005 for defendants to answer, move or otherwise respond to the Verified Complaint. A proposed order is attached hereto.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Michael D. Torpey
Susan Resley
Erin L. Bansal
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, California 94105
(415) 773-5700

Dated: June 6, 2005
685190

By: 
Stephen C. Norman (#2686)
Hercules Plaza, 6th Floor
1313 North Market Street
P.O. Box 951
Wilmington, Delaware 19899
(302) 984-6000
E-mail: snorman@potteranderson.com

Attorneys for Defendants

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FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I do hereby certify that, on June 6, 2005, the within document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY EMAIL AND HAND DELIVERY

Francis G.X. Pileggi, Esquire
Sheldon K. Rennie, Esquire
Fox Rothschild LLP
919 North Market Street, Suite 1300
Wilmington, Delaware 19801

A handwritten signature in black ink, appearing to read 'Stephen C. Norman', is written over a horizontal line.

Stephen C. Norman (#2686)
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000
E-mail: snorman@potteranderson.com